

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT  
OF PENNSYLVANIA**

**In re:**

**EDITH M. CHEW,** : **CHAPTER 13**  
**Debtor** : **BANKRUPTCY NO. 20-12591**

**ORDER PERMITTING DEBTOR TO REPLACE CONFIRMED fFOURTH AMENDED  
CHAPTER 13 PLAN WITH ATTACHED FIFTH AMENDED CHAPTER 13 PLAN**

AND NOW, this day of December, 2023, no opposition arising, it is hereby  
ORDERED that the confirmed Fourth Amended Chapter 13 Plan of the Debtor is replaced by  
the Fifth Amended Plan of the Debtor attached to the within motion.

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**DEBTOR’S MOTION TO MODIFY PLAN POST-CONFIRMATION**

The Debtor now comes and requests that she be permitted to modify her outstanding confirmed plan with the attached Fifth Amended Plan (“the Plan”), stating in support thereof as follows:

1. The Debtor’s Fourth Amended Plan was confirmed on June 21, 2021.
2. That Plan provided that the Debtor would cure the delinquent tpre-petition arrears owed to her in her mortgagee, Shellpoint Mortgage co., by making payments sufficient to cure those arrears in her fourth Amended chapter 13 plan.
3. The Debtor has become in arrears on the trustee payments on her current plan because her law practice income declined due to her illness and insufficient payments by her clients.
4. However, her mortgagee proposed that she apply for a loan modification, which would have the effect of eliminating any delinquency to the mortgagee going forward.
5. The Debtor has submitted an application to the mortgagee to obtain this loan modification. Although the mortgagee has requested that the application must be amended, the Debtor is confident that she will be able to make the revisions requested and that the mortgagee will approve the loan modification,

thereby eliminating the Debtor's need to cure the mortgage arrears in the plan.

6. The Debtor's treatment of the creditors paid directly by the Debtor in the Fourth Amended Plan, Radnor Township and USAA Federal Savings Bank, are the same as in the Fifth Amended Plan..
7. However, the Plan eliminated the Debtor's cure of her mortgage arrears in the Plan, as this would no longer be required due to the loan modification.
8. The Debtor therefore believes that the Plan can and should be confirmed, and therefore requests that the Plan replace the Fourth Amended Plan.

WHEREFORE, the Debtor requests permission to replace his present plan with the Plan attached hereto.

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/s/DAVID A. SCHOLL  
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Attorney for Debtor

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